

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE THE BEAR STEARNS)	MASTER FILE No.:
COMPANIES, INC. SECURITIES,)	<u>08 MDL No. 1963 (RWS)</u>
DERIVATIVE, AND ERISA LITIGATION)	
)	NOTICE OF LEAD PLAINTIFF'S
This Document Relates to:)	MOTION FOR A DISTRIBUTION
)	ORDER APPROVING
Securities Action, 08 Civ. 2793 (RWS))	ADMINISTRATIVE DETERMINATIONS
)	AND DIRECTING PAYMENT OF NET
)	SETTLEMENT FUNDS

PLEASE TAKE NOTICE that Lead Plaintiff, the State of Michigan Retirement Systems, through its undersigned counsel, hereby moves this Court pursuant to Rule 23(e) of the Federal Rules of Civil Procedure for a Distribution Order that will, *inter alia*: (i) approve the administrative determinations of the Court-appointed Claims Administrator, The Garden City Group, Inc. (“GCG”), concerning the vast majority of Proof of Claim and Release Forms (“Proofs of Claim”) submitted, but preserving for a later date the resolution of “Claims-in-Process” and “Disputed Claims”; (ii) approve payment to a relatively small number of claimants who filed late but otherwise valid Proofs of Claim after the October 25, 2012 deadline but on or before June 15, 2013; (iii) direct the distribution of 90% of the Net Settlement Funds to Authorized Claimants whose claims have been accepted as valid and approved by the Court according to the Distribution Plan for the Net Settlement Funds described in the accompanying Declaration of Jason Zuena in Support of Lead Plaintiff’s Motion for a Distribution Order Approving Administrative Determinations and Directing Payment of Net Settlement Funds (“Zuena Declaration”); (iv) direct that distribution checks must be cashed within 120 days after the issue date; (v) approve payment of GCG’s outstanding fees and expenses incurred in

connection with the administration of the Settlements; (vi) establish June 15, 2013 as the bar date beyond which no new claims will be allowed; and (vii) authorize destruction of Proofs of Claim after the final distribution is complete.

Lead Plaintiff's motion is supported by the accompanying memorandum of law, the Zuena Declaration and exhibits annexed thereto, the papers and pleadings on file in the Action, and any other matters the Court may consider. The Defendants take no position on the motion.

A proposed Distribution Order is submitted herewith for the Court's consideration.

Dated: July 11, 2013

Respectfully submitted,

LABATON SUCHAROW LLP

By: Thomas A. Dubbs, Jr.

Thomas A. Dubbs (TD-9868)
James W. Johnson (JJ-0123)
Nicole M. Zeiss (NZ-3894)
140 Broadway
New York, NY 10005

BERMAN DEVALERIO

By: _____

Joseph J. Tabacco, Jr. (JJT-1994)
One California Street, Suite 900
San Francisco, CA 94111
Tel: (415) 433-3200
Fax: (415) 433-6382

Patrick T. Egan (PE-6812)
One Liberty Square
Boston, MA 02109
Tel: (617) 542-8300
Fax: (617) 542-1194

*Co-lead Counsel for Lead Plaintiff State of
Michigan Retirement Systems and
Class Counsel for the Settlement Class*

connection with the administration of the Settlements; (vi) establish June 15, 2013 as the bar date beyond which no new claims will be allowed; and (vii) authorize destruction of Proofs of Claim after the final distribution is complete.

Lead Plaintiff's motion is supported by the accompanying memorandum of law, the Zuena Declaration and exhibits annexed thereto, the papers and pleadings on file in the Action, and any other matters the Court may consider. The Defendants take no position on the motion.

A proposed Distribution Order is submitted herewith for the Court's consideration.

Dated: July 11, 2013

Respectfully submitted,

LABATON SUCHAROW LLP

By: _____

Thomas A. Dubbs (TD-9868)
James W. Johnson (JJ-0123)
Nicole M. Zeiss (NZ-3894)
140 Broadway
New York, NY 10005

BERMAN DEVALERIO

By: Joseph J. Tabacco, Jr. // By: M.D.R.

Joseph J. Tabacco, Jr. (JJT-1994)
One California Street, Suite 900
San Francisco, CA 94111
Tel: (415) 433-3200
Fax: (415) 433-6382

Patrick T. Egan (PE-6812)
One Liberty Square
Boston, MA 02109
Tel: (617) 542-8300
Fax: (617) 542-1194

*Co-lead Counsel for Lead Plaintiff State of
Michigan Retirement Systems and
Class Counsel for the Settlement Class*